

Tecumseh Redevelopment, Inc.

EPA ID Number: NYD002134880

Other (Former) Names of Site

Seneca Steel, Bethlehem Steel Corporation, International Steel Group

Site Description

Tecumseh Redevelopment, Inc. (TRI) bought International Steel Group (ISG) in May 2003, which in turn had purchased Bethlehem Steel Corporation in March of 2003. TRI's Lackawanna site is located on Hamburg Turnpike (Route 5), on the eastern end of Lake Erie, south of the City of Buffalo. The facility occupies approximately 2,000 acres, extending over two miles along the eastern shoreline of Lake Erie, south of Buffalo. The plant has been in operation since the early 1900s. Over 440 acres consist of man-made land, referred to as the Slag Fill Area, which was created by placing large volumes of iron-making and steel-making slag along what once was the bottom of Lake Erie. The site housed a large, fully integrated steel plant that included the whole range of iron and steel making operations.

Aerial photographs and records from 1938 to the present indicate areas of the Slag Fill Area (SFA) were used for the management of waste materials, including sludges from the facility's wastewater treatment plants; sludges, dusts, and liquids from iron-making, steel-making, steel-forming, steel-finishing, and coke-making operations; and dredge materials from Smokes Creek. The SFA has also been the site of oil storage tanks, coal storage piles, and management areas for various types of materials from this facility's operations. As a result, some of the main areas of environmental concern are located in the SFA.

In 1988, on behalf of the United States Environmental Protection Agency (EPA) Region 2, the EPA National Enforcement Investigations Center conducted a Resource Conservation and Recovery Act (RCRA) Facility Assessment of the Lackawanna site. The investigations identified 104 solid waste management units and six surface water bodies (watercourses) that received or could have received solid wastes containing hazardous waste and/or constituents. The site is also listed in the New York State Registry of Inactive Hazardous Waste Sites, as a Class 2 Site, indicating that the site poses a significant potential threat to human health and the environment.

In August 1990, Tecumseh Redevelopment, Inc. (then Bethlehem Steel Corporation) and

EPA Region 2 entered into an Administrative Order on Consent (the Order) pursuant to Section 3008(h) of RCRA. This Order required Bethlehem Steel to perform a RCRA Facility Investigation to identify the nature and extent of any release(s) of hazardous waste and/or constituents from solid waste management units and certain water courses to the environment, and mitigate any emergency situations that might be discovered during the course of the investigations. This Order did not include a requirement to conduct interim corrective measures.

The RCRA Facility Investigation (RFI) has been conducted in a total of five phases, with input from both the New York State Department of Environmental Conservation (NYSDEC) and the EPA. The RFI Report is not final. Bethlehem Steel Corporation (BSC) has been submitting various portions of the RFI which the agencies have been reviewing. It is anticipated that the RFI Report will become final in 2004. BSC went into bankruptcy and was sold to the International Steel Group in March 2003, which was purchased by Tecumseh Redevelopment, Inc. in May of 2003.

Site Responsibility and Legal Instrument

USEPA Resource Conservation and Recovery Act (RCRA) 3008(h) Administrative Order on Consent.

Permit Status

New York State public-noticed a draft Part 373 Post-Closure Permit in 1991. This permit action was never completed, due to the presence of the USEPA RCRA 3008(h) Administrative Order on Consent.

In November 1980, pursuant to Resource Conservation and Recovery Act (RCRA) Section 3005(e), Bethlehem Steel submitted a Part A interim status application to the EPA for two hazardous waste disposal facilities (designated Hazardous Waste Management Unit No.1. [HWM-1] and Hazardous Waste Management Unit 2 [HWM-2] within the Slag Fill Area (SFA). Unit HWM-1 is comprised of two units: HWM-1A (SWMU S-13) and HWM-1B (SWMU S-16). HWM-2 is also referred to as SWMU S-3. The tar sludge impoundment, HWM 1-A, was closed in October 1988 in accordance with a New York State Department of Conservation (NYSDEC) approved closure plan. This unit is maintained in accordance with the post-closure care provisions of the closure plan.

Petitions to delist the wastes (that is to remove them from regulation under federal hazardous waste laws) in HWM-1B (spent pickle liquor sludge) and HWM-2 (ammonia still lime sludge) were submitted by Bethlehem Steel Corporation to the EPA in 1985 and 1984, respectively. In 1996, the EPA granted the delisting petition for HWM-2 and in 1997, the NYSDEC also agreed to delist the waste in HWM-2. The petition for HWM-1B is still pending.

Potential Threats and Contaminants

The investigations conducted to date have been primarily focused on the slag fill portion of the site (western half of the site). These investigations have identified widespread groundwater contamination and the presence of highly contaminated waste in various solid waste management units at the site. Although elevated concentration of heavy metals have been identified in some wells, groundwater contaminants are primarily volatile and semi-volatile organics related to the coking operations (coal roasting).

Light non-aqueous phase liquids (i.e., contaminants that float on top of the water table) are also found in a portion of the slag fill area designated as the Benzol Plant Yard. Contaminants in the groundwater can be found above the NY State Groundwater Quality Standards. While groundwater at the facility is not currently used, the site groundwater discharges predominantly to Lake Erie, with smaller components to the other surface water bodies including: Smokes Creek, Blasdell Creek, Ship Canal, and the North and South Water Trenches.

The investigation has also identified sediments, contaminated at levels exceeding the New York State Department of Conservation (NYSDEC) Asevere effects@screening criteria, in several surface water bodies at the site.

Cleanup Approach and Progress

The site has numerous waste disposal units that contain highly contaminated materials, primarily from the coking operations. Disposal at many of these units pre-dated Resource Conservation and Recovery Act (RCRA), and although many have been inactive for decades, most have never been properly closed under any regulatory program. These wastes may require excavation and/or stabilization prior to capping. The facility needs to perform a corrective measures study, to identify appropriate remedial alternatives for the various units and contaminated media present at the site and in the adjacent surface water bodies. Interim measures should be implemented at certain units to limit exposure potential.

Groundwater

Under the current Order, Tecumseh Redevelopment, Inc. (TRI) is not required to implement interim corrective measures except to mitigate any emergency situations that are discovered during the course of the investigation. Although the EPA requested that the facility implement interim corrective measures for the groundwater in the coke oven and acid tar pit areas in 1994, no interim corrective measures have been implemented in those areas. To date, the facility has refused to implement interim corrective measures recommended by the Agencies. However, TRI has been independently evaluating Non-Aqueous Phase Liquid (NAPL) recovery in the Benzol Plant area.

Although there is widespread groundwater contamination at this site, there are readily discernible source areas where benzene concentrations are >50,000 times the State

standard, and where free product has been found. Primary source areas are located in Zone 2, the Coke Oven Area and the Tank Farm Area. Groundwater throughout most of the slag fill area has an extremely high pH, often in the range of 12 standard units, due to the facility's operation.

Site Repository

Copies of supporting technical documents and correspondence cited in this site fact sheet are available for public review at:

USEPA Region 2
RCRA Records Center
290 Broadway, 15th Floor
New York, NY 10007
Contact Person: James Reidy
Telephone (212) 637-4172

NYSDEC - Region 9
270 Michigan Avenue
Buffalo, NY 14203
Contact Person: Stanley Radon
Telephone (716) 851-7220

NYSDEC - Albany
Bureau of Radiation and Hazardous Site Management
Division of Solid & Hazardous Materials
50 Wolf Road - Room 460
Albany, NY 12233-7252
Contact Person: Larry Thomas
Telephone (518) 402-8594